



JAMES E. JOHNSON
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

INNA SHAPOVALOVA
Assistant Corporation Counsel
Phone: (212) 356-2656
Fax: (212) 356-3509
Email: inshapov@law.nyc.gov

November 30, 2020

BY ECF

Honorable Ramon E. Reyes
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Ismael Joel Suren v. City of New York, et al.
19 CV 2659 (KAM) (RER)

Your Honor:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, and the attorney for defendants City of New York, Allan Ward, Alejandro Villalona, Peter Wong, Benjamin Lee, Daniel Mizvesky, Samuel Perez, Nicholas Kowatch, Brian Gribbin, Paul Ortiz, Krista Owens, and John Slavinsky (hereinafter "Defendants") in the above-referenced matter. As set forth below, defendants write respectfully to request that the Court cancel the telephone conference scheduled for December 2, 2020.

By way of background, following a status conference held on July 28, 2020 and a joint request from plaintiffs and defendants for an extension of time to complete discovery, Your Honor extended the close of fact discovery until November 28, 2020 and scheduled a telephone conference to be held on December 2, 2020. (ECF Docket Entry Dated July 28, 2020.) In light of the Court's Order dated November 30, 2020 resetting the discovery deadlines and scheduling telephone conferences to be held on February 17, 2021 and August 3, 2021, defendants respectfully request that the Court cancel the telephone conference currently scheduled for December 2, 2020.

Defendants thank the Court for its time and consideration.

Respectfully submitted,

/s/ *Inna Shapovalova*

Inna Shapovalova
Assistant Corporation Counsel
Special Federal Litigation Division

cc: **BY FIRST CLASS MAIL**
Ismael Joel Suren, plaintiff *pro se*
329 Lexington Avenue, # 2A
Brooklyn, New York 11216

Lucia Santiago, plaintiff *pro se*
32 Starr Street, # 3R
Brooklyn, New York 11221

Edgar Joel Suren, plaintiff *pro se*
32 Starr Street, # 3R
Brooklyn, New York 11221

Nelson Santiago, plaintiff *pro se*
32 Starr Street, # 3R
Brooklyn, New York 11221